

**NAPOLI BERN RIPKA LLP**  
Attorneys At Law

October 7, 2011

**BY HAND**

Honorable Lawrence M. McKenna  
United States District Judge  
United States District Court  
Daniel Patrick Moynihan  
500 Pearl Street  
NY, NY 10007

**MEMO ENDORSED**

RECEIVED  
IN CHAMBERS

OCT 11 2011

LAWRENCE M. McKENNA  
USDJ SDNY

Re: *In The Matter Of The Complaint Of ANDREW HARNETT, As Owner Of  
Vessel M/V READY JET GO*  
Docket No.: 06-0699 (LMM)

*In The Matter Of Peter J. Sharp Boathouse, Inc., As Owner Of The  
Floating Vessel Constituting The Boat House, Seeking Exoneration From  
Or Limitation Of Liability*  
Docket No.: 06 Civ. 3061 (LMM)

*In The Matter Of New York Rowing Association, Inc. As Owner Of A  
2001, Coxless Empacher Rowing Shell, Seeking Exoneration From Or  
Limitation Of Liability*  
Docket No.: 06 Civ. 3062 (LMM)

*And a fourth related case.*

Dear Hon. McKenna:

We write on behalf of the Runsdorf Claimants to request an extension of the deadline of filing oppositions to the motions in limine and for summary judgment made by Petitioners Peter J. Sharp Boathouse, Inc., New York Rowing Association Inc., and Andrew Harnett. These motions were filed last week. Due to the volume and number of motions made by petitioners, the Runsdorf Claimants request an extension to *Wednesday October 19<sup>th</sup>, 2011*; with a reply due *November 2, 2011*.

The Runsdorf Claimants have proposed the extension to counselors Michael Stern, Esq., and Lawrence Brennan, Esq., and neither had an objection to our request for an extension.

With respect to the scheduled trial, all parties are also asking for an adjournment of the October 31, 2011 date. The Runsdorf Claimants and Petitioners Peter J. Sharp Boathouse, Inc., New York Rowing Association Inc., have agreed to mediate the case before December 15, 2011; and would also like a conference with your Honor at or

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Granted. Trial adjourned  
without date. So order  
LMM 10/13/11

around that time as well. Petitioner Harnett is seeking authorization for the mediation with his client, but does not have any opposition to the remaining parties scheduling same.

Please do not hesitate to contact the undersigned should you have any questions or concerns.

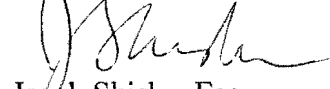
Very truly yours,  
Napoli Bern Ripka, LLP



Marina Zapantis, Esq.

*And*

Tabak, Mellusi & Shisha, LLP



Jacob Shisha, Esq.

cc:

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